

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	HON. GENE E.K. PRATTER
	:	
v.	:	
	:	
	:	CRIM. NO. 18-101
MEHDI NIKPARVAR-FARD	:	
a/k/a "Mehdi Armani"	:	

ORDER

AND NOW, this \_\_\_\_\_ day of October 2023, upon consideration of defendant's *Fifth Motion to Modify Conditions of Release (Unopposed)*, it is hereby **ORDERED** that the said Motion is **GRANTED**. The defendant's conditions of release are modified to reflect that as of the date of this Order, the defendant, Mehdi Nikparvar-Fard, is permitted to be at 122 East 3<sup>rd</sup> Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m., seven days a week for a period of thirty days.

By the Court:

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HON. GENE E.K. PRATTER  
JUDGE, U.S. DISTRICT COURT

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	:	CRIM. NO. 18-101
MEHDI NIKPARVAR-FARD	:	
a/k/a "Mehdi Armani"	:	

FIFTH MOTION TO MODIFY CONDITIONS OF RELEASE (UNOPPOSED)

Defendant Mehdi Nikparvar-Fard, by his counsel, Caroline Goldner Cinquanto, Esquire, respectfully requests this Court grant his *Fifth Motion to Modify Conditions of Release (Unopposed)* and in support thereof states the following:

1. On September 19, 2023, this Court Ordered that the defendant provide a list of items that needed to be completed at 122 East 3rd Street, Pottstown, Pennsylvania, as well as an estimated time for their completion. [Doc. No. 646]
2. On September 22, 2023, the defendant met with Jeff Neiman, a Code Enforcement Officer for the Borough of Pottstown, Pennsylvania. Mr. Neiman identified a list of structural deficiencies at 122 East 3rd Street, Pottstown, Pennsylvania which requires immediate repairs and corrections. These deficiencies are set forth in Exhibit 1, which is attached hereto.
3. The defendant estimates that it will take thirty days to make the necessary repairs and corrections. Once the repairs and corrections are complete, Mr. Neiman has directed the defendant to submit a comprehensive structural analysis report, performed by a registered Structural Engineer, confirming the completion of the necessary repairs and corrections.

4. The defendant estimates that it will take thirty days to complete the necessary repairs and corrections.
5. AUSA Mary Kay Costello does not object to this temporary modification of the defendant's pretrial release.

In conclusion, the defendant, Mehdi Nikparvar-Fard, respectfully requests that the terms of his pretrial release be temporarily modified to allow him to be at 122 East 3rd Street, Pottstown, Pennsylvania between the hours of 8 a.m. and 5 p.m. seven days a week for a period thirty days from the date of the Court's Order so that he may perform the necessary repairs and corrections at that location.

Respectfully submitted,

/s/ Caroline Goldner Cinquanto  
Caroline Goldner Cinquanto  
The Law Office of Caroline Goldner Cinquanto  
3331 Street Road, Suite 450  
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Date: October 6, 2023

CERTIFICATE OF SERVICE

I, Caroline Goldner Cinquanto, hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Motion to the following counsel:

MARY KAY COSTELLO  
UNITED STATES ATTORNEY'S OFFICE  
615 CHESTNUT STREET  
SUITE 1250  
PHILADELPHIA, PA 19106-4476

/s/ Caroline Goldner Cinquanto  
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Date: October 6, 2023